

STATE OF WISCONSIN  
CIRCUIT COURT  
EAU CLAIRE COUNTY

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TAMMY J. ANGELL  
3321 Sundet Road  
Eau Claire, WI 54703

Plaintiff v.	Case No. Case Code: 30107 Case Type: PI-Other
<b>WALMART, INC.</b> CT Corporation System 301 S. Bedford Street, Suite 1 Madison, WI 53703	

**GROUP HEALTH COOPERATIVE OF EAU CLAIRE**  
Peter Farrow  
Group Health Cooperative of Eau Claire  
2503 N. Hillcrest Parkway  
Altoona, WI 54720

Defendants

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**PLAINTIFF'S REPLY TO COUNTERCLAIM  
BY GROUP HEALTH COOPERATIVE OF EAU CLAIRE**

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Plaintiff re-alleges all allegations contained in Plaintiff's complaint except as otherwise modified herein or otherwise explicitly pleaded.

1. Plaintiff expressly denies all allegations contained in GHC's Counterclaim unless otherwise addressed or admitted herein.
2. Plaintiff admits upon information and belief that she was insured under a health policy issued by GHC.
3. Plaintiff admits upon information and belief the amount of payments made by GHC to date and affirmatively asserts the terms and conditions of that health policy are controlled by applicable Wisconsin law.
4. Plaintiff denies the terms of the health policy issued by GHC entitles GHC to subrogation and puts GHC to its strict burden of proof to establish such an entitlement to subrogation.

WHEREFORE, judgment is demanded as follows:

- (1) against the Defendant GHC for damages and other relief in accordance with the allegations of the complaint;

(2) dismissing parties who may have claims based on subrogation or a right to reimbursement, and barring such parties from participating in any judgment or settlement in this action; and

(3) for costs, interest and such other relief the court deems just and proper.

Dated this 11<sup>th</sup> day of January, 2021.

LAGOM LAW, LLC.

Electronically signed by Jeffrey A. Muszynski

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By: Jeffrey A. Muszynski, #1074414  
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